

[SEE SIGNATURE PAGE FOR COUNSEL]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STIPULATION FOR EXTENSION OF TIME

Plaintiff Ed Daie and Defendants Intel Corporation, Reed Group, and Claim Appeal Fiduciary Services hereby stipulate and move the Court for an Order extending the time for Plaintiff to file his Opposition Brief against Defendants' Motion for Summary Judgment. In support hereof, the parties show the Court as follows:

- 1 1. On June 10, 2016, Defendants filed a Motion for Summary Judgment on
- 2 Plaintiff's claim. In support of the motion, Defendants filed 51 exhibits from the
- 3 Administrative Record, totaling 2,643 pages in length.
- 4 2. At the time of Defendants' filing, Plaintiff's counsel was out of the country on
- 5 previously scheduled family vacation. Counsel did not return to the office until
- 6 June 16, 2016.
- 7 3. Currently, pursuant to Local Rule 7-3(a), Plaintiff's Opposition Brief is due to be
- 8 filed on June 24.
- 9 4. Plaintiff's counsel does not believe that 8 days is sufficient time to adequately
- 10 respond to Defendant's Motion for Summary Judgment, given the complexity
- 11 and volume of the Administrative Record in dispute. Plaintiff's counsel believes
- 12 that this matter can be resolved on summary judgment; therefore, its response
- 13 to Defendant's motion is of paramount importance.
- 14 5. Plaintiff's counsel contacted Defendant's counsel on June 20 to discuss its
- 15 agreement to a two-week extension of time for the filing of its Opposition.
- 16 Defendant's counsel had no objection to the extension and agreed to the
- 17 proposed stipulation.
- 18 6. This request is not brought for the purpose of delay, but to give Plaintiff's
- 19 counsel adequate time to construct and respond to Defendant's motion.
- 20 WHEREFORE, the parties respectfully request that the Court grant Plaintiff a
- 21 two-week extension for the filing of its Opposition Brief. The Opposition would be due
- 22 on July 8 and Defendant's Reply would be due on July 15. In order to give the Court
- 23 adequate time to review the filings, the parties request that the motion hearing and
- 24
- 25
- 26
- 27
- 28

1 further case management conference be continued until August 4, 2016.
2

3 Dated: June 22, 2016

4 Respectfully submitted,
5

6 By: /s/ Eric Whitehead
7 Ray Bourhis, Esq. SBN 53196
Eric Whitehead, Esq. SBN 301449
8 RAY BOURHIS ASSOCIATES
12 Funston Avenue
9 San Francisco, CA 94129
Tel: (415) 392-4660
Fax: (415) 421-0259
10 RFBourhis@gmail.com
Eric.Whitehead@RayBourhis.com
11

12 Attorneys for Plaintiff, Ed Daie
13

14 By: /s/ Nancy Pridgen
15 Nancy B. Pridgen (*pro hac vice*)
npridgen@patelburkhalter.com
16 PATEL BURKHALTER LAW GROUP
4045 Orchard Road, Building 400
17 Atlanta, GA 30080
Tel. (404) 551-5884
18 Fax (678) 812-3654
19

20 Attorney for Defendants
21 INTEL CORPORATION, REED GROUP,
22 and CLAIM APPEAL FIDUCIARY SERVICES
23
24
25
26
27
28

1
2 **~~[PROPOSED]~~ ORDER**
3

4 PURSUANT TO STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED
5 that the deadline for Plaintiff to file his Opposition Brief is extended until July 8.
6 Defendant's Reply Brief is due July 15. The motion hearing and further case
7 management conference will be continued until Thursday, August 4 at 8:00 a.m. in
8 Courtroom 8, 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102.
9

10 Dated: June 22, 2016.

11
12 
13

14 Hon. William Alsup
United States District Judge
15
16
17
18
19
20
21
22
23
24
25
26
27
28